

In the Matter of)	DA 03-2952
)	
VONAGE HOLDINGS)	
CORPORATION)	WC Docket No. 03-211
)	
Petition for Declaratory Ruling)	
Concerning an Order of the)	
Minnesota Public Utilities Commission)	

[illegible]

1. I am employed as a Police Officer by the City of St Paul Police Department. My business address is 100 E. 11th Street, St Paul, MN 55101.

3. I have over 26 years of experience as a police officer. I've been assigned to the Communication Center for 19 years as dispatcher, shift supervisor, and commander. I am currently the Computer Assisted Dispatch System Administrator for all Police, Fire, and EMS agencies in Ramsey County.

4. I have been asked to comment on the differences between calls routed to non-emergency or administrative numbers at Public Safety Answering Points (PSAPs) and calls routed through the 911 network to emergency numbers at PSAPs. I have also been asked to

comment on any public safety concerns that could arise from the routing of 911 calls to non-emergency or administrative numbers at PSAPs.

5. My comments are focused on the communications system in place at the St Paul Police Department.

6. Calls coming in on non-emergency or administrative numbers at the St Paul Police Department are answered last. Communications personnel at the St Paul Police Department expect that emergency calls will be routed through the 911 network to the emergency numbers at the St Paul Police Department. For that reason, communications personnel do not expect to receive emergency calls when answering calls routed to non-emergency or administrative telephone numbers at the Department. While we are prepared to handle any call on any line, for purposes of internal prioritization we answer 911 first and then the 7 digit and administration lines.

7. Furthermore, only calls routed to emergency numbers through the 911 network have Automatic Number Identification (ANI) and Automatic Location Information (ALI). ANI provides the caller's telephone number. ALI provides the PSAP operator with the caller's location. Calls that are routed to non-emergency or administrative telephone numbers of PSAPs do not provide the PSAP operator with ANI or ALI.

8. As a result, the PSAP operator does not know the number of the caller or the caller's location unless that information is provided by the caller. The FCC has mandated that all wireless (cell phone) calls to 911 be able to be located within 50 meters of the placing cell phone. We have worked years and spent millions nation-wide to move towards this goal. The reason for this mandate was to insure cell users the same level of service and protection that land-line users had received and had come to expect. Millions have been spent on public

education as to the proper use of the 911 system. Now this new type of phone service and the technological shortcomings inherent in the system place all this effort into jeopardy.

9. In terms of public safety, there are several problems with the routing of 911 emergency calls to non-emergency or administrative numbers at the PSAP. First, as I mentioned above, calls to non-emergency or administrative numbers are answered last by the St Paul Police Department because the Department does not expect 911 emergency calls to be routed by companies to non-emergency or administrative numbers. Sometimes this delay can add extra minutes to the time it takes the Department to answer a call. In the case of an urgent emergency, such as a heart attack, where a matter of seconds can make the difference between life and death, this delay of minutes in the answering of a call can make a real difference.

10. Second, while the main administrative telephone number at the City of St Paul Police Department is answered 24 hours a day, it is my understanding that not all PSAP non-emergency numbers are answered 24 hours a day. In some smaller communities, the non-administrative numbers have recordings to call 911 after hours in case of an emergency.

11. Third, because calls routed to PSAPs over non-emergency or administrative numbers do not have ALI or ANI, there is no way to know where the call is coming from in the event the caller is not able to provide that information over the call. This presents real safety risks. For example, in my experience, rape victims have dialed 911 but have not been able to tell the operator their location. ALI has allowed the St Paul Police to identify where the call came from and dispatch a unit to the scene of the crime without talking to the victim on the telephone. Similarly if a caller goes unconscious before being able to provide his or her location, ALI allows the Police Department to dispatch an ambulance and a unit to the caller's location. If these same persons had dialed 911 but the call was routed to a non-emergency number or an administrative number, there would be no way to know from where the persons in these

emergency situations were calling. As a result, persons could die that might not die if an ambulance could have been dispatched and criminals could escape that might not if a police unit could be dispatched. These are very real situations that occur more than you would think. Many examples can be provided.

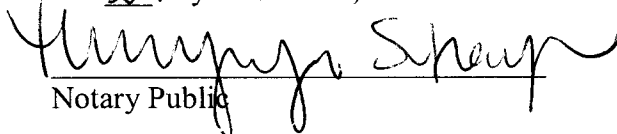
12. Finally, if a company provides telephone service to customers without filing a 911 plan with the State Department of Administration and the company routes 911 calls from its customers to non-emergency or administrative telephone numbers at PSAPs, there is no way for the PSAPs to know that 911 calls from customers of these companies are going to be routed to the non-emergency or administrative numbers. The call may arrive at a receptionist or secretary and not at the PSAP at all. Many small departments answer the administrative lines between 8:00 a.m and 5:00 p.m. and then roll them over to the PSAP after hours.

13. In terms of portable computer-based telephone systems, if I have a Minnesota home address and take my computer to Iowa and place a 911 call, I will be routed to my home police PSAP in Minnesota, not the location and state where the assistance is required. One can just imagine the response nightmare that this might begin. Countless lost moments as PSAP personnel struggle to locate a injured victim, with no real hope except luck, as time runs out and hope turns to loss.

FURTHER YOUR AFFIANT SAYETH NOT.


SERGEANT FRED FISCHER

Subscribed and sworn to before me
this 27 day of October, 2003


Notary Public

